

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**MANUEL AMILL CORREA-FIGUEROA,
AS REPRESENTATIVE OF THE ESTATE
OF AMIRA IVELISSE TORRES, AND AS
REPRESENTATIVE OF THEIR MINOR
CHILD AMINELLIS CAMILLE CORREA-
TORRES,**

Civil No. 12-1149 (DRD)

Plaintiff,

-against-

HECTOR PESQUERA, ET ALS,

Defendants.

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST
ALL DEFENDANTS**

TO THE HONORABLE COURT:

NOW COMES the plaintiff thorough the undersigned attorney and very respectfully states and prays as follows:

1. All identified defendants in this case were served with the summons and complaint. On August 20, 2012 defendant Wilfredo Ramirez-Rosario appeared through counsel Antonio Bauza and requested an extension of time. [Doc. 14] On August 20, 2012, the Court granted said defendant an extension of thirty (30) to answer the complaint. [Doc. 15]

2. On September 14, 2014, defendants Hector Pesquera-Figueroa, Juan

Santana- Rodriguez, Osvaldo Morales-Santiago, Luis Rivera-Irizarry, Jesus M. Herrera, Wilfredo Ramirez- Rosario, Jose- Arroyo-Baez, Angel Guilfu, and Bill Fernandez, represented by counsel Lavinia Aparicio-Lopez, from the P.R. Justice Department, filed a Motion to Dismiss the Complaint for Lack of Jurisdiction. [Doc. 23]

3. By an Order dated February 4, 2013, the Court denied the defendants' Motion to Dismiss. [Doc. 26]

4. Although more than thirty (30) days have elapsed since the Court denied the defendants' Motion to Dismiss, defendants Hector Pesquera-Figueroa, Juan Santana-Rodriguez, Osvaldo Morales-Santiago, Luis Rivera-Irizarry, Jesus M. Herrera, Wilfredo Ramirez- Rosario, Jose- Arroyo-Baez, Angel Guilfu, and Bill Fernandez have failed to plead or otherwise defend.

WHEREFORE, for the foregoing reasons, plaintiff respectfully requests that default judgments be entered against defendants Hector Pesquera-Figueroa, Juan Santana- Rodriguez, Osvaldo Morales-Santiago, Luis Rivera-Irizarry, Jesus M. Herrera, Wilfredo Ramirez- Rosario, Jose- Arroyo-Baez, Angel Guilfu, and Bill Fernandez.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of March, 2013.

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all interested parties/attorneys.

S/ Ramon M. Gonzalez

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